Joew@car-mcclellan.com CARR, McCLELLAN, INGERSOLL, THOMPSON & HORN Professional Law Corporation 216 Park Road P.O. Box 513 Burlingame, California 94011-0513 Telephone: (650) 342-9600 Facsimile: (650) 342-7685 Attorneys for Plaintiff Kimberley Ann Woo, Trustee Of The Wilbur and Dolores L. Woo 1987 Irrevocable Trust DONALD W. REES (SBN 34329) drees@gordonrees.com LESLIE K. CRARY (SBN 148260) lorary@gordonrees.com GORDON & REES LLP Embarcadero Center West 275 Battery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-5900 Facsimile: (415) 986-8054 Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA VINITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, VS. STIPULATION AND [PROPOSED]	Keith P. Bartel, Esq. (Bar No. 83223) kbartel@carr-mcclellan.com David M. King, Esq. (Bar No. 95279) dking@carr-mcclellan.com	
Brofessional Law Corporation 216 Park Road P.O. Box 513 Burlingame, California 94011-0513 Telephone: (650) 342-9600 Facsimile: (650) 342-7685 Attorneys for Plaintiff Kimberley Ann Woo, Trustee Of The Wilbur and Dolores L. Woo 1987 Irrevocable Trust DONALD W. REES (SBN 34329) dress@gordonrees.com LESLIE K. CRARY (SBN 148260) lerary@gordonrees.com GORDON & REES LLP Embarcadero Center West 275 Battery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-8054 Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA WINITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants.	Jeffrey R. Loew, Esq. (Bar No. 216808) jloew@carr-mcclellan.com	TOSONI & HODNI
Burlingame, California 94011-0513 Telephone: (650) 342-9600 Facsimile: (650) 342-7685 Attorneys for Plaintiff Kimberley Ann Woo, Trustee Of The Wilbur and Dolores L. Woo 1987 Irrevocable Trust DONALD W. REES (SBN 34329) drees@gordonrees.com LESLIE K. CRARY (SBN 148260) lcrary@gordonrees.com GORDON & REES LLP Embarcadero Center West 275 Battery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-8054 Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants.	Professional Law Corporation	PSON & HORN
Telephone: (650) 342-9600 Facsimile: (650) 342-7685 Attorneys for Plaintiff Kimberley Ann Woo, Trustee Of The Wilbur and Dolores L. Woo 1987 Irrevocable Trust DONALD W. REES (SBN 34329) drees@gordonrees.com LESLIE K. CRARY (SBN 148260) lerary@gordonrees.com GORDON & REES LLP Embarcadero Center West 275 Battery Street. Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-5900 Facsimile: (415) 986-8054 Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants.	P.O. Box 513	
Kimberley Ann Woo, Trustee Of The Wilbur and Dolores L. Woo 1987 Irrevocable Trust DONALD W. REES (SBN 34329) drees@gordonrees.com LESLIE K. CRARY (SBN 148260) lcrary@gordonrees.com GORDON & REES LLP Embarcadero Center West 275 Battery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-5900 Facsimile: (415) 986-5900 Facsimile: (415) 986-8054 Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants.	Telephone: (650) 342-9600	
drees@gordonrees.com LESLIE K. CRARY (SBN 148260) lerary@gordonrees.com GORDON & REES LLP Embarcadero Center West 275 Battery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-5900 Facsimile: (415) 986-8054 Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, Vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants.	Kimberley Ann Woo, Trustee Of The Wilbur	
LESLIE K. CRARY (SBN 148260) lcrary@gordonrees.com GORDON & REES LLP Embarcadero Center West 275 Battery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-5900 Facsimile: (415) 986-8054 Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants. Defendants.	DONALD W. REES (SBN 34329)	
GORDON & REES LLP Embarcadero Center West 275 Battery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 986-5900 Facsimile: (415) 986-8054 Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants.	LESLIE K. CRARY (SBN 148260)	
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Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF AMERICA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants.	Telephone: (415) 986-5900	
UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, Vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants.		
NORTHERN DISTRICT OF CALIFORNIA KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants. No. C 06-03545 CRB (San Francisco Superior Court Case No. CGC 06-451976) Complaint Filed: May 5, 2006 STIPULATION AND [PROPOSED] ORDER RE CONTINUANCE OF CAS MANAGEMENT CONFERENCE		
KIMBERLEY ANN WOO, AS TRUSTEE OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants. No. C 06-03545 CRB (San Francisco Superior Court Case No. CGC 06-451976) Complaint Filed: May 5, 2006 STIPULATION AND [PROPOSED] ORDER RE CONTINUANCE OF CAS MANAGEMENT CONFERENCE	UNITED STATE	CS DISTRICT COURT
OF THE WILBUR AND DOLORES L. WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, (San Francisco Superior Court Case No. CGC 06-451976) Complaint Filed: May 5, 2006 STIPULATION AND [PROPOSED] ORDER RE CONTINUANCE OF CAS MANAGEMENT CONFERENCE	NORTHERN DIST	RICT OF CALIFORNIA
WOO 1987 IRREVOCABLE TRUST, Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants. (San Francisco Superior Court Case No. CGC 06-451976) Complaint Filed: May 5, 2006 STIPULATION AND [PROPOSED] ORDER RE CONTINUANCE OF CASE MANAGEMENT CONFERENCE	KIMBERLEY ANN WOO, AS TRUSTEE	No. C 06-03545 CRB
Plaintiff, vs. THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants. Complaint Filed: May 5, 2006 STIPULATION AND [PROPOSED] ORDER RE CONTINUANCE OF CAS MANAGEMENT CONFERENCE		
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants. STIPULATION AND [PROPOSED] ORDER RE CONTINUANCE OF CAS MANAGEMENT CONFERENCE	Plaintiff,	
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, and DOES 1 through 10, Defendants. ORDER RE CONTINUANCE OF CAS MANAGEMENT CONFERENCE	vs.	· · ·
Defendants.	COMPANY OF AMERICA, and DOES 1	ORDER RE CONTINUANCE OF CASE
	Defendants.	

STIPULATION

Pursuant to this court's order of August 14, 2006 referring this case to mediation, mediation was previously scheduled to go forward on December 6, 2006 with Arnold B. Haims. Following investigation and discovery, plaintiff's counsel determined that it would be advisable to include a third party, attorney Richard S. Linder (and his insurer) in the mediation of this matter. Accordingly, a stipulation and proposed order to extend time in which to conduct the mediation was submitted to the court, to give Mr. Linder and his insurance carrier time to become conversant with the case in order to attend the mediation in a meaningful manner. On November 28, 2006, this court granted the stipulation and order, extending the deadline for mediation up to and including February 26, 2007.

On November 28, 2006, attorney Jerry Hauser of the law firm of Phillips, Greenberg & Hauser in San Francisco contacted counsel for plaintiff and advised that he had been retained by Mr. Linder's insurance carrier, Liberty Mutual, to represent Mr. Linder. On November 28, 2006, copies of the general pleadings, discovery pleadings, responses to discovery and a copy of Mr. Linder's deposition transcript were sent by overnight mail to the offices of Mr. Hauser for his review.

Mr. Hauser indicated that Mr. Linder and Liberty Mutual would be willing to voluntarily attend the mediation in an effort to resolve the case, without the necessity of amending the complaint to formally assert a cause of action against Mr. Linder. Accordingly, it is anticipated that as soon as Mr. Hauser has had an opportunity to review the pleadings and documents provided, mediation will be rescheduled with Mr. Haims within the extended jurisdictional period for completion of mediation.

WHEREAS, the parties will be rescheduling the mediation to take place before February 26, 2007, the parties request that the current case management conference set for December 15,

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1	2006 be vacated and rescheduled for a date after February 26, 2007.	
2		
3	Dated: November 30, 2006	
4	CARR, McCLELLAN, INGERSOLL, THOMPSON & HORN Professional Law Corporation	
5	Professional Law Corporation	
6	By:	
7	DAVID M. KING Attorneys for Plaintiff	
8	Kimberley Ann Woo, Trustee Of The Wilbur and Dolores L. Woo 1987 Irrevocable Trust	
9		
10	Dated: November 30, 2006	
11	GORDON & REES, LLP	
12	By:/s/	
13 14	DONALD W. REES LESLIE K. CRARY	
15	Attorneys for Defendant PRUDENTIAL INSURANCE COMPANY OF	
16	AMERICA	
17		
18	I, DAVID M. KING, hereby attest that Leslie Crary, counsel for Defendant, concurs in	
19	the filing of this stipulation.	
20	Dated: November 30, 2006 By:/s/	
21	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
22	ORDER	
23		
24	December 15, 2006 be rescheduled for a date after February 27, 2007. Case management conference scheduled for March 2, 2007 at 8:30 a.m. ES DISTRICE.	
25	DATED: December 4 , 2006	
26	Judge Charles R. Breyer United States District Country IT IS SO ORDERED	
27		
28	25740.00001\BGLIB1\1313456.1	
	25740.00001\BGLIB1\1313456.1 STIPULATION AND ORDER RE: CONTINUANCE OF AND DISTRICT OF	
ı	DISTRICTOR	